Before the

FEDERAL COMMUNICATIONS COMMISSION

Washington, DC

In the Matter of:	)	
	)	
Amendment of Part 97 of the Commission's	)	RM-11306
	)	
Rules Governing the Amateur Radio Services	)	

Comments on RM-11306

By

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I have been a licensed amateur since 1963. I principally operate CW, SSB an AM on the HF amateur bands.

I appreciate the need to address band planning because of wider band digital modes in use in the CW sub-bands and because of the imbalance between the large size CW sub-bands that are frequently under used at the same time as adjacent phone segments are overcrowded. Bandwidth subband planning may be a suitable "shift in regulatory philosophy", but it has some problems in its present incarnation in RM-11306.

My concerns lie in the unexpected consequences of mixing wide band digitial signals with phone signals in the same sub-bands. A relatively few wide band digital signals would have the potential to make large portions of proposed 3.5kHz

phone bands unusable. Though the number of digital wide band signals is relatively small now, it has the potential to grow because of its association with Internet use via radio, a use that may not be necessary, but may be utilized to avoid charges for commercial Internet access. Wideband digital is more prone to intractible QRM problems because some of these signals will be for all practical purposes running unattended. Today in the great majority of cases, stations inadvertantly interferring with one another can talk to each other to resolve the interference. It will not be easy for a phone operator to get the attention of the operator of the digital signal to resolve differences. Most interfering phone operators have an incentive to resolve differences so that the communications of the interferring QSOs can proceed. This will not be the case with digital stations that can continue transmit retries over the top of other communications until acknowledgments are received.

Limiting the wide band digital signals to only a portion of the proposed 3.5kHz bandwidth sub-bands may be a solution.

I approve of the special exception for AM. This exception might appear to be an unfair use of bandwidth, but it has to be remembered that most of AM communication today is focused on audio quality, and AM operations are most often found on off peak band usage times to avoid adjacent channel interference so that the advantages of the mode can be fully realized. Also AM operations are much more likely in roundtables vs. multiple two person QSOs. For these operating style factors rather than theoretical formulation, the greater bandwidth of

AM for all practical purposes is an insignificant factor in planning for reduced band crowding.

Respectfully submitted,

Dale Gagnon